

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALPARI (US) LLC, on behalf of itself and all
others similarly situated,

Plaintiff,

-against-

BNP PARIBAS, S.A.

Defendant.

No. 17 Civ. 05278 (LGS)

ALPARI (US) LLC, on behalf of itself and all
others similarly situated,

Plaintiff,

-against-

CREDIT SUISSE GROUP AG; CREDIT
SUISSE AG; and CREDIT SUISSE
SECURITIES (USA), LLC,

Defendants.

No. 17 Civ. 05282 (LGS)

ALPARI (US) LLC, on behalf of itself and all
others similarly situated,

Plaintiff,

- against -

ROYAL BANK OF SCOTLAND GROUP PLC
and RBS SECURITIES, INC.,

Defendants.

No. 17 Civ. 05284 (LGS)

**DECLARATION OF LAURA R. HALL IN SUPPORT OF DEFENDANTS' MOTION TO
COMPEL ARBITRATION OR, IN THE ALTERATIVE, TO DISMISS THE AMENDED
COMPLAINTS ON GROUNDS OF FORUM NON CONVENIENS**

I, Laura R. Hall, hereby declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury, as follows:

1. I am admitted to the bars of the State of New York and this Court. I am a partner at the law firm of Allen & Overy LLP, counsel for defendant BNP Paribas in the above-captioned matter.

2. I submit this declaration in support of BNP Paribas's motion to compel arbitration, or, in the alternative, to dismiss the amended complaint on grounds of *forum non conveniens*, and to place before the Court the following exhibits attached hereto.

3. Attached hereto as Exhibit 1 is a true and correct copy the Agreement for the Provision of Pricing and Liquidity between BNP Paribas and Alpari (US) LLC, dated May 24, 2011.

4. Attached hereto as Exhibit 2 is a true and correct copy of the Master FX Give-Up Agreement between BNP Paribas and Morgan Stanley, dated November 17, 2004.

5. Attached hereto as Exhibit 3 are true and correct copies of the FX Give-Up Agreement Notices between BNP Paribas and Morgan Stanley, dated July 19, 2010 and subsequently amended on September 28, 2010, January 20, 2011, May 4, 2011, May 24, 2010, July 7, 2011, August 18, 2011, October 19, 2011, March 14, 2012, May 11, 2012, August 28, 2012, and November 21, 2012.

6. Attached hereto as Exhibit 4 is a true and correct copy of the ISDA Agreement between BNP Paribas and Morgan Stanley, dated November 27, 2007.

7. Attached hereto as Exhibit 5 is a true and correct copy of the Agreement for the Treatment of Rejected Give-Up Transactions between BNP Paribas and Alpari (US) LLC, dated July 21, 2010.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 7, 2017
New York, New York



Laura R. Hall

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Counsel for Defendant BNP Paribas